

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SOLAS OLED LTD.,

Plaintiff,

v.

DELL INC.,

Defendant.

Case No. 6:19-cv-00514-ADA

SOLAS OLED LTD.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 6:19-cv-00515-ADA

SOLAS OLED LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 6:19-cv-00537-ADA

SOLAS OLED LTD.,

Plaintiff,

v.

HP INC.,

Defendant

Case No. 6:19-cv-00631-ADA

**DECLARATION OF PHILIP X. WANG IN SUPPORT OF
SOLAS'S OPENING CLAIM CONSTRUCTION BRIEF**

DECLARATION OF PHILIP X. WANG

I, Philip X. Wang, declare as follows:

1. I am a member of the State Bar of California and a partner at the law firm of Russ August & Kabat, counsel for Plaintiff Solas OLED Ltd. in the above-captioned action. I have personal knowledge of the facts set forth herein and, if called upon to testify, could and would testify competently thereto.

2. Attached hereto as Exhibit 1 is a true and correct copy of Declaration of Richard A. Flasck in support of Solas's opening claim construction brief.

3. Attached hereto as Exhibit 2 is a true and correct copy of U.S. Patent No. 6,072,450.

4. Attached hereto as Exhibit 3 is a true and correct copy of U.S. Patent No. 7,447,338.

5. Attached hereto as Exhibit 4 is a true and correct copy of U.S. Patent No. 7,573,068.

6. Attached hereto as Exhibit 5 is a true and correct copy of U.S. Patent No. 7,499,042.

7. Attached hereto as Exhibit 6 is a true and correct copy of U.S. Patent No. 7,663,615.

8. Attached hereto as Exhibit 7 is a true and correct copy of the Parties' joint revised list of terms/constructions dated June 12, 2020.

9. Attached hereto as Exhibit 8 is a true and correct copy of The Authoritative Dictionary of IEEE Standards Terms (7th ed. 2000) ("IEEE Dictionary"), definitions of "drain," "source," select," and "substrate."

10. Attached hereto as Exhibit 9 is a true and correct copy of Microsoft Computer Dictionary (3rd ed., 1997), definition of "signal" and 'scan line."

11. Attached hereto as Exhibit 10 is a true and correct copy of McGraw-Hill Dictionary of Scientific and Technical Terms (4th ed., 1989), definitions of "data transmission line," "source," drain," and "selection circuit."

12. Attached hereto as Exhibit 11 is a true and correct copy of Merriam-Webster Dictionary (avail. at www.merriam-webster.com, accessed May 2020), definitions of “select,” “selection,” “sequential,” and “series.”

13. Attached hereto as Exhibit 12 is a true and correct copy of Dictionary.com (avail. at www.dictionary.com, accessed May 2020), definitions of “period,” “section,” “sequence,” and “sequential.”

14. Attached hereto as Exhibit 13 is a true and correct copy of Oxford Concise Dictionary (12th ed., 2011), definitions of “period” and “section.”

15. Attached hereto as Exhibit 14 is a true and correct copy of Claim Construction Memorandum and Order from *Solas OLED Ltd. v. Samsung Display Co., Ltd.*, 2:19-CV-00152-JRG, Dkt. 99 (E.D. Tex. Apr. 17, 2020).

16. Attached hereto as Exhibit 15 is a true and correct copy of Claim Construction Order from *Solas OLED Ltd. v. LG Display Co., LG Elec., Inc., and Sony Corp.*, Dkt. 82, Case 6:19-cv-00236-ADA (W.D. Tex. June 9, 2020).

17. Attached hereto as Exhibit 16 is a true and correct copy of the Parties’ Joint Claim Construction Statement from *Solas OLED Ltd. v. LG Display Co., LG Elec., Inc., and Sony Corp.*, Dkt. 76, Case 6:19-cv-00236-ADA (W.D. Tex. May 1, 2020).

18. Attached hereto as Exhibit 17 is a true and correct copy of HP’s proposed claim constructions, served May 22, 2020.

19. Attached hereto as Exhibit 18 is a true and correct copy of Plaintiff Solas OLED Limited’s Disclosure of Asserted Claims and Infringement Contentions, Case No. 2:19-cv-00152-JRG (E.D. Texas), served on Oct. 7, 2019.

20. Attached hereto as Exhibit 19 is a true and correct copy of Apple's proposed terms for construction, Case No. 6:19-cv-00537-ADA, served on April 30, 2020.

21. Attached hereto as Exhibit 20 is a true and correct copy of Apple's proposed claim constructions, Case No. 6:19-cv-00537-ADA, served on May 22, 2020.

22. Attached hereto as Exhibit 21 is a true and correct copy of excerpts from the transcript of the April 14, 2020, Telephonic Motion Hearing from *Solas v. Dell and Google*, Case Nos. 6:19-cv-00514-ADA, 6:19-cv-00515-ADA.

23. Attached hereto as Exhibit 22 is a true and correct copy of excerpts from The New Oxford American Dictionary, Second Edition (2005).

24. I declare under penalty of perjury that the foregoing is true and correct. Executed this twenty-fifth day of June, 2020, at Los Angeles, California.

/s/ Philip X. Wang
Philip X. Wang